

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et	§	
al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	5:21-CV-0844-XR
	§	(Consolidated cases)
	§	
GREGORY W. ABBOTT, et al.,	§	
<i>Defendants.</i>	§	

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**RENEWED MOTION TO INTERVENE OF HARRIS COUNTY REPUBLICAN PARTY,  
DALLAS COUNTY REPUBLICAN PARTY, REPUBLICAN NATIONAL COMMITTEE,  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE, AND  
NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE**

The Harris County Republican Party, Dallas County Republican Party, Republican National Committee (“RNC”), National Republican Senatorial Committee (“NRSC”), and National Republican Congressional Committee (“NRCC”) (collectively, “Republican Committees”) respectfully renew their motion to intervene as defendants in these consolidated cases under Federal Rule of Civil Procedure 24.<sup>1</sup>

For the reasons stated by the U.S. Court of Appeals for the Fifth Circuit, *La Union del Pueblo Entero v. Abbott*, 29 F.4th 299 (5th Cir. 2022), the Republican Committees have satisfied Rule 24(a)(2)’s requirements for intervention as of right. Namely, “[t]he Committees made a timely application to intervene by right, they claim interests relating to SB 1 which is the subject

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<sup>1</sup> The OCA-Greater Houston Plaintiffs, Mi Familia Vota Plaintiffs, LUPE Plaintiffs, Houston Area Urban League Plaintiffs, LULAC Plaintiffs, Travis County Defendants, and Harris County Elections Administrator Isabel Longoria oppose the relief requested in this motion. The United States does not oppose the relief requested in this motion. Counsel for the remaining parties did not respond to undersigned counsel’s request for their position before the motion was filed.

of this consolidated suit, their absence from the suit may practically impede their ability to protect their interests, and the existing parties might not adequately represent those interests.” *Id.* at 309.

No party sought rehearing or rehearing *en banc* of the Fifth Circuit’s decision within the 45-day period provided by the rules, *see* Fed. R App. P. 40(a)(1), which expired on Monday, May 9. Accordingly, the Republican Committees respectfully ask the Court to grant their renewed motion to intervene as defendants in these cases. As required by Rule 24(c), a proposed answer for each of the consolidated lawsuits is attached.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

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*\*Pro hac vice* applications forthcoming

\*\*Application for admission to the Western District of Texas pending

Admitted in Pennsylvania

Not admitted in D.C. (directly supervised by John M. Gore, a licensed D.C. Bar member)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to all counsel of record.

/s/ John M. Gore  
*Counsel for Proposed Intervenor-Defendants*